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*Attorneys for United States of America*

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, )  
 )  
Petitioner, )  
 )  
v. )  
 )  
PAYWARD VENTURES INC., d/b/a )  
KRAKEN OR KRAKEN.COM, OR ITS )  
PREDECESSORS, SUBSIDIARIES, )  
DIVISIONS, OR AFFILIATES, )  
 )  
Respondent. )

Civil Number: 3:23-mc-80029-JCS

**UNITED STATES' NOTICE OF  
REDACTIONS OVER OBJECTION**

PLEASE TAKE NOTICE that concurrent with this filing, the United States is filing its Response to Payward Ventures Inc.'s Opposition to Petition to Enforce Internal Revenue Service Summons and the supporting Second Declaration of Karen Cincotta with redactions consistent with the filed and redacted versions of Payward Ventures Inc.'s Opposition to Petition to Enforce Internal Revenue Service Summons (ECF No. 16) and the Declaration of Todd Siemers (ECF No. 16-4). Payward filed an Administrative Motion to Seal (ECF No. 17) and an Amended Administrative Motion to Seal (ECF No. 19) and the United States has filed oppositions to both. (ECF Nos. 18 and 20). The Court has yet to rule on either administrative motion.

1 The United States submits these redacted documents over its objections stated in its filed  
2 oppositions only to preserve the record for the Court's decision. The filing of these redacted versions is  
3 not a concession that these documents are properly sealed or that Payward's redactions are appropriate.

4 Dated this 5th day of May, 2023.

5 DAVID A. HUBBERT  
6 Deputy Assistant Attorney General

7 /s/ Amy Matchison  
8 AMY MATCHISON  
9 Trial Attorney, Tax Division  
10 U.S. Department of Justice  
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